

NYISO Project Prioritization 2024

Start of Block: Default Question Block

Q1



PROJ Please score the projects that your organization believes are the most important for the NYISO to pursue in 2025. All survey responses and comments will be made public and posted with Budget and Priorities Working Group materials after the survey due date of July 14, 2024.

- **You have a total of 100 points to allocate to as many projects as you like. Please only use POSITIVE whole numbers and no decimals. Negative numbers are not accepted.**
- **Click on the project title to display a description. To minimize the description, click on the project title again. There is an area under each project to add any comments pertaining to that project.**
- **You may share your link with your colleagues to work collaboratively on scoring prior to submitting your scores.**
- **Any questions, please reach out to Kevin Pytel at kpytel@nyiso.com or 518-356-8892.**

The organization you are completing this survey for is:

[\\${e://Field/ExternalDataReference}](#).

1. 5-Minute Transaction Scheduling

1.1 Problem / Opportunity

Currently, interchange with external control areas is achieved on either a 15-minute or an hourly basis using the NYISO's Real-Time Commitment (RTC) software. A significant portion of Internal Generation is scheduled every five minutes. More frequent interchange scheduling with external control areas could notably improve convergence between prices in RTC and Real-Time Dispatch (RTD) and provide additional balancing and/or ramping capabilities. With increased penetration of intermittent renewables, five-minute transactions

would provide greater flexibility to RTD and would create more consistency between internal and external resource scheduling.

1.2 Project Objective(s) & Anticipated Deliverable(s)

The project builds upon the study completed in 2020 that evaluated the feasibility of scheduling interchange every five minutes with external control areas. This project will expand on the recommendation from the study by developing market rules and a mechanism to schedule interchange every five minutes using the RTD with Hydro-Québec (HQ). This will include evaluating the benefits of a transaction vs. generator model in greater detail.

The 2025 project deliverable will be Market Design Complete.

1.3 Project Justification

This market improvement is expected to improve price convergence between RTC and RTD, and improve market efficiency by increasing the number of resources available to address real-time system changes and/or events. More frequent scheduling that aligns with internal generation scheduling frequencies will also help to alleviate top-of-hour and quarter-hour interchange discrepancies between RTC and RTD.

The added flexibility that more frequent interchange scheduling provides is particularly important with the State-mandated requirements for renewable generation and other clean energy resources to replace the use of fossil fuel generation. This effort will focus on incorporating five-minute scheduling with HQ, as this is the only neighboring Balancing Authority that has expressed interest in developing that capability. : _____ (1)

2. Advanced Storage Tools

2.1 Problem / Opportunity

Currently, when the NYISO is short on Energy or Capacity in a given hour, operators will commit additional resources or modify Energy Limited Resources (ELR) or Capacity Limited Resource (CLR) unit schedules to provide the remainder of the necessary Energy or Capacity. These resources may include Distributed Energy Resources (DER), Energy Storage Resources (ESR), or any other generator that did not already have a commitment for that hour. However, as DER and ESR penetration increases, the process for operators to redispatch resources becomes more complex.

Due to their inherent energy duration limitations, dispatching an ESR in one hour will reduce its state of charge and subsequently impact how it can perform in future hours. Therefore, if NYISO operators redispatch an ESR to account for a shortage of Energy in a given hour, the ESR may not be able to meet its Energy schedule in the coming hours. This issue is especially significant when an ESR that was originally scheduled to inject Energy during hours in the peak load window is re-dispatched to provide Energy earlier in the day. The Advanced Storage Tools

project will address considerations for the redispatch of an ESR and whether the asset will have the necessary state of charge to continue to meet its Energy schedule.

2.2 Project Objective(s) & Anticipated Deliverable(s)

The market design concepts will seek to assess methods for enhancing the market modeling and operation of ESRs. The NYISO will coordinate with stakeholders to consider market design concepts governing the redispatch of an ESR throughout the day and the impacts of the redispatch on the resource's availability later in the day. The deliverable for this effort in 2025 will be a Market Design Complete.

2.3 Project Justification

As more behind-the-meter resources enter the market, net load profiles may deviate from expectations, resulting in Real Time needs differing from projections. As such, the redispatch of resources may become more frequent, and Advanced Storage Tools is expected to provide NYISO operators the necessary flexibility and tools to account for increased net load variability while providing Market Participants (MPs) additional capabilities to manage limited energy resources availability throughout the day. This effort is also important in supporting feasible participation of limited duration resources as the NYISO considers expanding its Energy and Ancillary Service product offerings as described in the Balancing Intermittency and Dynamic Reserves efforts. : _____ (2)

3. Advancing NYISO Transparency - Requested by DC Energy

3.1 Problem / Opportunity

Posting more information would aid in the transparency of wholesale market operations and market participation. The additional data requested below can be posted publicly or protected through CEII protocols, depending on the information classification.

3.2 Project Objective(s) & Anticipated Deliverable(s)

The following additional data should be posted by the NYISO:

1. State estimator modal and data including:
 - a. Topology
 - b. Branch characteristics
 - c. Branch flows
2. Transmission line rating for all transmission lines/facilities monitored, including when they change and why
3. Day-Ahead Market (DAM) and Real-Time Market (RTM) contingencies. The NYISO has a separate list of contingencies for DAM/RTM relative to what the NYISO models in the Transmission Congestion Contracts (TCC) auctions, and the NYISO only publishes the TCC contingencies.

The project will review the information requested to determine its classification (public, CEII, confidential, etc.), develop software to automate extracting the data that can be shared based on its classification from the appropriate system, including working with vendors that support

NYISO systems for modifications, and developing software to periodically post data in a manner that is designed to protect CEII and other Confidential Information.

The 2025 project deliverable will be Deployment.

3.3 Project Justification Provided by DC Energy

Open, transparent, and competitive NYISO markets are essential to facilitate efficient solutions and provide benefits to consumers. The Federal Energy Regulatory Commission (FERC) has opined many times on the benefits that transparent and competitive markets deliver, for example:

- Commission’s conclusions in AD14-14 that transparency plays a critical role in improving price formation.
- Without sufficient transparency, MPs may not have the tools necessary to critically analyze and discuss problems and identify potential solutions to market inefficiencies.
- Order No. 704 conclusion: “[Such] policies [i.e., the Commission’s market-oriented policies for the wholesale natural gas industries] require that interested persons have broad confidence that reported market prices accurately reflect the interplay of legitimate market forces. Without confidence in the basic processes of price formation, MPs cannot have faith in the value of their transactions, the public cannot believe that the prices they see are fair, and it is more difficult for the Commission to ensure that jurisdictional prices are ‘just and reasonable.’” : _____ (3)

4. Ancillary Services Shortage Pricing Update

4.1 Problem / Opportunity

With an increasing share of intermittent generation within the New York Control Area (NYCA), it is increasingly important to rely on Ancillary Services such as reserves and regulation for handling uncertainties arising from intermittent generation. While fuel prices continue to fluctuate, it is essential to review the existing Ancillary Services shortage pricing structures to ensure that they reflect the market dynamics. The evolving energy landscape demands a comprehensive reassessment of pricing mechanisms to accommodate the growing prominence of renewables and maintain grid reliability. Thus, there is an opportunity to analyze and potentially recalibrate existing pricing frameworks to better align with the evolving energy mix and mitigate potential disruptions.

4.2 Anticipated Project Deliverable(s)

The 2025 project deliverable will be a Study Complete.

4.3 Project Justification

This project would enhance the existing energy, reserves, and regulation pricing structures, especially with the expanding role of renewable energy sources and new market structures. By assessing current pricing mechanisms, the project aims to bolster grid reliability and align pricing strategies accordingly. After thorough analysis, potential shortage price adjustments

could improve overall electricity pricing effectiveness, benefiting stakeholders and the broader energy ecosystem. : _____ (4)

5. Balancing Intermittency

5.1 Problem / Opportunity

In a time of unprecedented change in the electricity sector, New York's competitive electricity markets must be positioned to unleash the innovation and flexible energy solutions necessary for a reliable transformation towards a zero-emissions power grid. A rapid transition is underway in New York State from a power grid where energy is largely produced by central-station fossil fuel generation, towards a grid with increased intermittent renewable resources and distributed generation.

The pace of this transition is driven primarily by state policy, notably the Climate Leadership and Community Protection Act (CLCPA). In addition, technological advancements are expanding the capabilities of new resources and lowering their costs, further driving broader industry changes.

The NYISO is actively working on market enhancements to meet these future challenges. A grid characterized by high levels of intermittent renewable resources, ESR, and DER will require new thinking to adequately balance intermittency on the system and the associated system ramps. The NYISO approaches this work with two guiding principles: (1) all aspects of grid reliability must be maintained; and (2) competitive markets should continue to maximize economic efficiency and minimize the cost of maintaining reliability while supporting the achievement of New York's climate policy codified in the CLCPA.

The 2022 Grid in Transition Study identified the potential level of system flexibility that will be required with increases in intermittent resources and evaluate grid and/or resource attributes necessary to continue to reliably maintain system balance.

5.2 Project Objective(s) & Anticipated Deliverable(s)

Using the work completed to date across various NYISO studies and initiatives, including the Reliability and Market Considerations for a Grid in Transition work, Grid in Transition project work, and any relevant external studies on the ramp and flexibility needs of the future, this project will examine the existing NYISO market structures and market rules and will determine if there are any changes or additions needed to maintain reliability. While the 2024 effort was to complete the market design, the 2025 project will deploy Phase 1 of the software changes to support the approved market design.

5.3 Project Justification

The CLCPA includes the following goals:

- 100% of the state's electricity must be emissions free by 2040
- 9,000MW of offshore wind energy must supply NY by 2035
- 6,000MW of solar energy be installed in NY by 2025
- Statewide reduction of 185 trillion BTUs through energy efficiency
- 3,000MW of energy storage capacity must be installed to serve NY by 2030

Continuation of this project will help to identify the means to maintain system reliability while addressing the state's goals and mandates in a cost-effective way through the creation of proper market mechanisms. This project also supports State of the Market (SOM) Recommendations 2021-1 and further evaluating 2017-2. : _____ (5)

6. Billing Organization Portfolios for Reporting - (*previously SubAccounts*)

6.1 Problem / Opportunity

Current NYISO accounting and settlement processes do not allow a MP to partition billing components by the source or type of commercial activity. This creates certain difficulties for companies with diverse portfolios of businesses and market transactions. For example, under the current system, a company may have separate MPs for activity in generation, trading, and TCC activities.

The solution will be a modification to the NYISO's settlement and invoicing systems to allow the utilization of portfolios nested under the existing Billing Organization to group transactions for reporting purposes.

6.2 Project Objective(s) & Anticipated Deliverable(s)

This project will modify invoice reporting in the NYISO settlement and invoicing systems to provide additional flexibility in a consolidated invoice query. The MP will be able to establish portfolios to separate market transactions on the invoice.

Portfolios for reporting will allow more detailed invoicing while keeping the overall settlement under a larger account. This project will implement the Market Design Complete deliverable determined by the 2024 project: ***SubAccounts for Reporting*** and include:

- A new user interface for the existing Invoice Detail Report to allow MPs to create portfolios for reporting purposes
- Reports based on various parameters within the existing NYISO data structure
- External and internal ability to label, save, and reuse report configurations
- External and internal ability to share custom reporting within the organization

This will be a reporting solution only. No changes are anticipated to credit rules, Billing Organization Banking Relationships, or to the existing Weekly and Monthly Invoicing by Billing Organization. The project deliverable for 2025 Deployment.

6.3 Project Justification

This NYISO portfolio reporting project can reduce costs to MPs by reducing the need to maintain multiple MPs and will allow additional flexibility for MPs to compartmentalize larger accounts for better tracking of various market transactions. Other ISOs and RTOs have successfully implemented the utilization of portfolio reporting to the benefit of their MPs (e.g., PJM and ISO-NE). : _____ (6)

7. Clean Hydrogen - Requested by NextEra and Constellation

7.1 Problem / Opportunity

Currently, NYISO's tariff does not clearly contemplate the co-location of an emissions-free generator and load arrangement, such as an electrolyzer producing clean hydrogen. The NYISO developed an Market Design Concept Proposed (MDCP) through collaboration with stakeholders to address this gap and seeks to further develop an Market Design Complete (MDC) and Functional Requirements Specifications (FRS) to advance the project towards target deployment in 2027.

7.2 Project Objective(s) & Anticipated Deliverable(s)

In 2024, the Clean Hydrogen Project investigated use cases proposed by MPs for loads co-located with non-emitting generation, including an electrolyzer producing clean hydrogen using energy from a co-located emissions-free generator. The NYISO worked with stakeholders to develop an MDCP in 2024. The 2025 effort will include development of any necessary tariff modifications to accommodate the 2024 MDCP and will also include an FRS to describe any anticipated system functionality required to support and facilitate the proposed enhancements.

7.3 Project Justification

Achieving New York's decarbonization goals will require a substantial amount of Dispatchable Emission Free Resources (DEFs) to complement and balance intermittent generation sources. Clean hydrogen is widely understood to be a necessary fuel source for DEFs, and the Clean Hydrogen Project is intended to develop market rules that will enable the development and deployment of clean hydrogen electrolyzers in New York State powered by co-located non-emitting generation.

Per New York State Energy Research and Development Authority (NYSERDA): "As New York transitions to a clean energy economy, we are seeking to understand and explore all resources that may be available as part of the State's comprehensive decarbonization strategy, including assessing the role of green hydrogen. Supporting innovation and studying all technologies will enable us to remain on the cutting edge of evolving solutions that will complement our existing decarbonization efforts in achieving the State's ambitious Climate Act goals." From the 2021-2040 Outlook: "As more wind, solar, and storage plants are added to the grid, DEFs must be developed and added to the system at scale to reliably serve demand when intermittent generation is unavailable. The lead time necessary for research, development, permitting, and construction of DEFs will require action well in advance of 2040 if state policy mandates under

the CLCPA are to be achieved. Fossil generation will likely need to be retained past the 2040 mandates to keep the system reliable if DEFR technology is not in operation.”

On April 7, 2023, NYSERDA, of behalf of the seven state Northeast Regional Clean Hydrogen Hub, applied to the U.S. Department of Energy (DOE) for a \$1.25 billion share of \$8 billion in federal hydrogen hub funding available as part of the Infrastructure Investment and Jobs Act. The proposal advances \$3.62 billion of direct hydrogen investments advancing clean electrolytic hydrogen production, consumption, and infrastructure projects for hard to decarbonize sectors. As a result, clean electrolytic hydrogen projects and production will likely increase substantially.
: _____ (7)

8. Cost Recovery for NYISO-Designated IROL Critical Generators- Requested by Advanced Power

8.1 Problem / Opportunity

Under North American Electric Reliability Corporation (NERC) guidelines, it is the NYISO’s responsibility to identify and designate generators critical to the derivation of Interconnection Reliability Operating Limits (IROL) (“IROL Critical Generators”). Once a unit is designated as an IROL Critical Generator, the generator is required to make NERC-mandated investments which correspond to its level of critical designation assigned by the NYISO.

These NERC mandated upgrades for reliability and security are above and beyond the requirements in NYISO tariffs and Interconnection Agreements. The NYISO tariff does not have a mechanism to permit cost recovery for capital costs and ongoing operations and maintenance for the NERC mandated- investments made by these IROL Critical Generators.

For clarity, the cost recovery for generators will be forward-looking only. Cost recovery for capital investment already made by current IROL Critical Generators operating in the NYISO markets would not be considered.

8.2 Project Objective(s) & Anticipated Deliverable(s)

The objective of this project is an MDC that develops tariff revisions that will allow designated IROL Critical Generators to recover costs related to compliance with NERC guidelines for IROL Critical designated units. The project will also have scope for the NYISO to determine the resources required to perform necessary cost reviews and software upgrades as needed.

8.3 Project Justification

The project is needed to allow generators designated by the NYISO as IROL Critical Generators the opportunity to recover the costs associated with meeting the NERC guidelines for IROL Critical Generators. The NYISO tariff does not have any means for cost recovery for capital

investment and ongoing O&M costs associated with the investments made to meet the NERC guidelines of IROL Critical Generators.

Other RTOs do allow cost recovery for these investments. PJM and ISO-NE have recently made updates to their tariffs to allow this cost recovery. : _____ (8)

9. Demand Curve Reset Process Evaluation

9.1 Problem / Opportunity

Every four years, the NYISO, along with its stakeholder community, conducts a comprehensive review to determine the parameters used in establishing the Installed Capacity (ICAP) Demand Curves. This process is referred to as the demand curve reset (DCR). As required by the tariff, the study includes an examination of potential peaking unit technologies and the capital and financial costs assumed in the construction and operation of that unit, along with an estimate of the projected profit earned in the Energy and Ancillary Service markets, to determine which unit has the “lowest fixed costs and highest variable costs among all other units’ technology that are economically viable.” The unit that satisfies this requirement is then used to determine the underlying parameters for each ICAP Demand Curve over the next four Capability Years.

Public policies, such as the Climate Leadership and Community Protection Act (CLCPA), and other factors are driving a transition of the power grid to a clean energy system. To account for these changes, it may be necessary to structure the ICAP Demand Curves using a framework that differs from the current framework required to be studied in the DCR (e.g., utilizing the “lowest fixed costs and highest variable costs among all other units’ technology that are economically viable” to determine the underlying parameters for each ICAP Demand Curve).

9.2 Project Objective(s) & Anticipated Deliverable(s)

This project will investigate whether changes, and the drivers of those changes, are needed to the DCR study framework to continue to send accurate, transparent price signals that promote reliability and economic efficiency. The 2025 deliverable for this project would be an Issue Discovery.

9.3 Project Justification

The ICAP market aims to maintain resource adequacy while incentivizing economically efficient resource entry and exit. However, the drivers for resource entry and exit have evolved in response to policy, environmental and other factors. For the ICAP market to continue sending accurate and transparent price signals promoting reliability and economic efficiency, changes may be needed to the structure of the ICAP Demand Curves studied during each DCR to account for the ongoing evolution of the resource fleet. : _____ (9)

10. Demand Curve WSR Revisions (SOM)

10.1 Problem / Opportunity

A winter-to-summer ratio (WSR) of available ICAP is used when determining the seasonal ICAP Demand Curves applicable for the Winter Capability Period. The WSR is utilized to account for expected seasonal differences in capacity availability when determining the winter reference point and maximum allowable clearing for each ICAP Demand Curve. Because the seasonal ICAP Demand Curves represent an apportionment of the annual gross and net cost of new entry values for the relevant hypothetical reference resource used to establish each curve, such seasonal curves are interrelated and must account for the relative expectation of differences in capacity availability throughout the year to, in aggregate, provide revenue adequacy for such hypothetical reference resource used. The current procedures for calculating the WSR annually use data regarding capacity available to be sold in the ICAP Spot Market Auctions over a historical three-year period.

As noted in the 2023 SOM Report, capacity sales from Unforced Capacity Deliverability Rights (UDR) resources may result in material divergence between the capacity availability assumed in the WSR and actual capacity sales in the ICAP Spot Market Auctions. For example, actual capacity sales from UDR resources that are persistently and materially lower than assumed when calculating the WSR could result in pricing outcomes that do not properly reflect actual system conditions.

10.2 Project Objectives & Anticipated Deliverables

In its SOM Report, the MMU recommends consideration of alternative procedures for determining the WSR values to better account for actual capacity sales in the ICAP Spot Market Auctions rather than capacity available to be sold in such auctions. The SOM Report recommends implementing changes to these procedures on an expedited basis due to the near-term nature of the risk resulting from the expectation of significant new UDR resource capacity additions within the next few years. The project deliverable for 2025 will be a MDCP milestone.

10.3 Project Justification

Recommendation 2023-5 of the 2023 SOM Report. : _____ (10)

11. Eliminate Offline GT Pricing

11.1 Problem / Opportunity

The NYISO's RTM is based on a dispatch model that updates prices and generator schedules every five minutes. Currently, the dispatch model treats 10-minute gas turbines (i.e., units capable of starting up in ten minutes) as if they can follow a 5-minute signal. Offline GT pricing was developed to produce real-time prices that reflect the costs of actual resources that could be committed to address a constraint. The MMU has observed that this structure leads to inefficiencies, because 10-minute gas turbines are unable to respond in five minutes. This may lead to periods of under-generation, inconsistencies between scheduled transmission flows and actual flows, and inefficient prices that do not properly reflect the balance of supply and

demand. The logic, however, provides useful information to grid operators regarding system needs and allows them to commit additional units based on evaluation by the RTD model.

11.2 Project Objective(s) & Anticipated Deliverable(s)

The scope of this project would involve eliminating the offline GT pricing logic, creating an information stream (that replaces the information provided by offline GT pricing) to help operators identify system needs and effectively commit additional units, and developing proposed tariff changes to support this effort. The 2025 deliverable for this project would be FRS.

11.3 Project Justification

This project would enhance market efficiency by better aligning price signals and schedules with operational needs and resource capabilities. This project is also supported by the Market Monitoring Unit based on their SOM Recommendation 2020-2. : _____ (12)

12. Engaging the Demand Side

12.1 Problem / Opportunity

Engaging consumers to assume greater control of their energy use will help to balance increasing penetration of intermittent and variable generation supporting New York State's zero emission and climate action policies. The NYISO's demand response (DR) programs and DER and Aggregation participation model offer electric consumers the opportunity to "supply" energy to the wholesale markets.

The NYISO's current DER model requires DER to be fully dispatchable in real time with no commitment parameters such as start-up time. NYISO's current Special Case Resource (SCR) model has a 21-hour advance notice and 2-hour in-day notice. SCRs are required to be a 4-hour capacity provider with no other time duration options. NYISO MPs have provided feedback that design revisions may provide new and existing Resources the ability to participate more fully using the current NYISO DER, or SCR models. The NYISO remains interested in exploring opportunities to enhance the DER and/or SCR models.

12.2 Project Objective(s) & Anticipated Deliverable(s)

The NYISO will advance the effort based on the 2024 MDCP. The 2025 project deliverable for this project will be an MDC.

12.3 Project Justification

Enhancements to the NYISO's DER and/or SCR models that further support robust participation of flexible demand in both DAM and RTM may provide another tool to balance the NYCA system, address resource intermittency, and support ancillary service providers. The team will further evaluate recommendations identified in the 2023 Issue Discovery effort to determine their merit. : _____ (13)

13. Engaging the Demand Side Phase 2

13.1 Problem / Opportunity

In 2024 the NYISO deployed the DER and Aggregation participation model expanding the opportunities for demand side resources to participate in NYISO administered markets. The NYISO remains interested in exploring opportunities to enhance the DER and/or reliability programs for smaller DER, flexible loads, and an emergency load reduction program. Areas of interest for small DER include alternative telemetry methodologies and evaluating participation pathways for DER less than 10 kW. Price-Responsive Load Bids have historically constituted a small percentage of total bid Load by volume, but flexible loads that are price sensitive can be evaluated as a useful tool for operators to manage both sides of load and supply. The NYISO will explore participation pathways for flexible load to participate and provide value to the system. Expanding tools that allow the NYISO to alert the public of grid emergencies are an additional implement for operators to maintain system reliability and stability.

13.2 Project Objective(s) & Anticipated Deliverable(s)

The NYISO will continue discussions with stakeholders based on the recommendations identified in the 2023 Engaging the Demand Side Report and the 2024 SCR market participant survey. The 2025 project deliverable for this project will be a Study Defined.

13.3 Project Justification

Enhancements to NYISO's DER and reliability-based models that further support robust participation of more resources in both DAM and RTM may provide another tool to balance the NYCA system, address resource intermittency, and support ancillary service providers. :
_____ (14)

14. Granular Capacity Market Pricing

14.1 Problem / Opportunity

The NYISO's capacity market has four pricing zones, which may not capture differences in the value of capacity in smaller regions within the existing pricing zones due to transmission constraints, both in the import and export direction. The NYISO's rules permit zone creation every four years, coinciding with the DCR. The NYISO is proposing to evaluate enhancements to the zone creation rules and the frequency with which new zones can be created to better align compensation to capacity suppliers with system needs.

14.2 Project Objective(s) & Anticipated Deliverable(s)

The NYISO will advance the discussion with stakeholders on the recommendations identified in the 2024 Granular Capacity Market Pricing report. The project deliverable will be a Study Defined.

14.3 Project Justification

Adjusting capacity pricing zones to incent reliability and recognize the value of capacity suppliers located in different zones could facilitate efficient retention and investment of capacity

in regions that provide the highest value while minimizing consumer costs. This project also supports SOM Recommendation 2022-4. : _____ (16)

15. Improved Small Customer Enrollment in DRIS - Requested by OhmConnect

15.1 Problem / Opportunity

Aggregators with a high volume of small customers face many enrollment challenges under existing NYISO program requirements:

- Demand Response Information System (DRIS) software data inputs may be restrictive
 - Only whole numbers are accepted in DRIS for subscribed loads, effectively establishing one kW as the minimum value.
 - Customer loads may go above and below 1kW between summer and winter seasons
- Small Customer Aggregations (SCAs) were designed to accommodate thousands of small customers using alternative methodologies outside of the DRIS software to participate in the NYISO DR programs. This may not be sufficient for some resources that desire to participate as individual SCRs but cannot meet size requirements and cause additional workload for both the aggregator and NYISO by utilizing the SCA model
 - Require burdensome manual administration for both aggregators and the NYISO
 - Once a customer is enrolled into a SCR, they cannot become part of a SCA
 - Only customers with loads below 1kW can be included in an SCA
 - Once a customer is in a SCA they cannot become a SCR unless they sit out for 18 months; many customers are <1 kW in the winter and >1kW in the summer
 - Restrictive data integrity and precision requirements
 - Does not account for user churn.
 - No easily accessible and accurate database or API to provide aggregators with the information necessary from the Transmission Owner to register a premise in NYISO programs, in particular the zone and active status of the customer
- DER model does not offer an alternative for participation
 - Small customers do not meet the 10kW minimum size requirement
 - Six second telemetry may be cost prohibitive and infeasible

15.2 Project Objective(s) & Anticipated Deliverable(s)

Develop a long term solution to facilitate automated small customer enrollment in load flexibility programs that provides the NYISO with the desired level of visibility of demand response resources.

There are many potential solutions that could be considered:

- Modification of DRIS coding to accept subscribed loads with decimal values in tenths to more accurately reflect small customers' ACLs, with a minimum of 0.10kW.
- Development of an automated SCA.
- DER-like model for small resources.
- Proxy demand resource program.
- Modify SCA rules to allow subscribed loads greater than 1kW.

The project deliverable for 2025 will be MDC.

15.3 Project Justification

To support a reliable and resilient grid and help the state achieve its clean energy goals, the development of streamlined processes to accommodate tens of thousands of small customers providing load flexibility would facilitate additional resources to participate in the wholesale market while reducing administrative burden for aggregators and the NYISO. : _____ (18)

16. Market Purchase Hub Transactions - Requested by LIPA

16.1 Problem / Opportunity

The ability for marketers to source energy from the wholesale market, (i.e., buy at Locational Based Marginal Pricing (LBMP) for sale to load or other parties is important for municipalities to take advantage of Treasury Department regulations allowing for tax advantaged prepaid energy market purchases that serve retail load, and may be valuable to a broad range of MPs for other commercial purposes. The Netting of Bilaterals (Trading Hubs) initiative was first proposed in 2008, but was limited to balanced transactions. The proposed project would expand the rules to allow market purchase hub transactions. To permit these unbalanced hub transactions, the project will need to address market design, collateral requirements, and energy imbalances. The project will consider mechanisms to allow the transfer of responsibility for these requirements to the ultimate load recipient.

16.2 Project Objective(s) & Anticipated Deliverable(s)

This project will; modify zonal trading hubs in the NYISO energy market systems to provide additional flexibility in scheduling of hub transactions. Using the NYISO and scheduling system, a Market Participant will be able to establish unbalanced transactions to purchase power from the NYISO market for ultimate delivery to a load. The Market Participant will be able to establish separate transactions to sell the power it purchases from the trading hub to a portfolio of load service entities that may be at different electrical locations in the same Load Zone as the Trading Hub. The purpose is to allow service to load, not virtual transactions. This project will

identify tariff, software, and procedural changes needed to bring about these changes. The 2025 deliverable will be a FRS Complete.

16.3 Project Justification

The market design will propose modifying zonal trading hubs by allowing unbalanced transactions to provide additional flexibility in scheduling of hub transactions. : _____ (22)

17. Mitigation Threshold Review

17.1 Problem / Opportunity

This project will perform a comprehensive review of all mitigation behavioral thresholds, including solicitation of feedback from stakeholders. This project will review all thresholds used for conduct and impact for mitigation, including the current Load Pocket Threshold (LPT) process.

17.2 Project Objective(s) & Anticipated Deliverable(s)

The objective of this project would be to evaluate all current mitigation thresholds, to improve the LPT methodology based on observations from the last several years, and to determine if any of the existing mitigation thresholds need to be modified.

This project will consider the following improvements:

1. Modifying the mitigation measure that predicts potential market power for each load pocket in the coming month, based on the number of transmission-constrained hours in the previous 12 months. The existing measure may not accurately forecast upcoming tightness of load pockets by neglecting the systematic tendency for tight constraints during summer peaks, but fewer constraints over the rest of the year.
2. Revising the method to determine the load pocket threshold. Currently, the formula uses a 12-month averaging of load-weighted and fuel-price-adjusted LBMPs to calculate the expected load-pocket LBMP in the coming month. The formula that calculates a weighted average of past load-pocket LBMPs could be revised to better predict load-pocket LBMP in the upcoming month. The proposal is focused on the yearly average. The NYISO wants to explore other options to replace the 12-month average with averages calculated over shorter, more relevant periods to better predict load-pocket LBMPs going forward, and hence create a more appropriate measure of the load pocket threshold.
3. The Market Services Tariff requires the NYISO to fuel-price-adjust LPTs, allowing the NYISO to specify the method of fuel price adjustment. Currently, the Market Mitigation and Analysis Department (MMA) implements this requirement by fuel-adjusting the LBMP term on a monthly basis. MMA proposes to change the frequency of fuel-adjusting LPTs from monthly to daily, so that each day LPTs maintain consistency with the daily fuel-price component of energy reference levels.
4. Automating the process of calculating LPTs, which currently consists of several manual steps that are time consuming and labor intensive. MMA proposes to work with Information

Technology to create a fully automated process with measures in place to validate results from each execution.

The project deliverable for 2025 will be Market Design Concept Proposed.

17.3 Project Justification

This project would allow for a comprehensive review of all mitigation thresholds, as well as the LPT methodology and process, to identify ways to improve the accuracy of and verification process for LPT calculations. : _____ (24)

18. Operating Reserves Performance

18.1 Problem / Opportunity

Assessing an operating reserves provider's stated capabilities or performance is becoming a growing concern as the grid becomes more dependent on intermittent renewable generators and limited duration or limited energy resources. It is important that the NYISO can count on resources' stated capabilities when they are instructed to convert reserves to energy in response to grid reliability needs, such as load balancing or contingency response. Additionally, under current market rules, operating reserves receive the same compensation regardless of their actual performance. This compensation structure may not provide adequate incentive to perform, creates an inefficiency in the market, and has potential negative impacts to system reliability.

Based on NERC and Northeast Power Coordinating Council rules, if the NYISO fails to procure sufficient reserves to recover from a Disturbance Control Standard event, the NYISO may be required to procure additional reserves and may be subject to financial penalties. Additionally, if a supplier cannot fully convert operating reserves to energy at the NYISO's direction, the NYISO must dispatch other, often more costly, resources to provide the needed energy, or be forced to take out-of-market actions that cause uplift and reduce efficiency. The Operating Reserves Performance project seeks to improve market efficiency and help maintain system reliability.

18.2 Project Objective(s) & Anticipated Deliverable(s)

Continuing the work from 2024, the deliverable for this project for 2025 is Software Design.

18.3 Project Justification

As the markets and grid are expected to rapidly evolve in the coming years and reliance on grid reliability services such as reserves increases, enhancements to the methods for both assessing the performance of operating reserves providers and ensuring that compensation appropriately reflects performance will be of growing importance. The MMU has previously recommended that the NYISO "[c]onsider means to allow reserve market compensation to reflect actual and/or expected performance [SOM Recommendation 2016-2]." The Operating Reserves Performance project seeks to improve incentives for a resource to accurately reflect the operating reserves that it is capable of providing. Ensuring that operating reserves capabilities are accurately stated will aid NYISO in procuring the necessary levels of operating

reserves for reliable operation and reduce the need for potentially less efficient and/or costly actions to ensure access to adequate production capability. : _____ (25)

19. Pivotal Supplier Calculation Enhancement

19.1 Problem / Opportunity

Each month the NYISO identifies Pivotal Suppliers that are subject to a must offer requirement and an offer cap in the monthly spot auction as part of administering the NYISO's Supply-Side Mitigation rules. The thresholds to identify Pivotal Suppliers are based on whether a Market Party controls an amount of UCAP, and some portion of that UCAP is necessary to meet the applicable Locality requirement of the Mitigated Capacity Zone. The identification of a Pivotal Supplier does not always correlate with the Market Party having a minimum portfolio size for which withholding capacity to increase prices would result in greater revenue for the portfolio. This project will attempt to align the Pivotal Supplier evaluation with the incentive of a Market Party to withhold capacity to influence prices.

19.2 Project Objective(s) & Anticipated Deliverable(s)

This project will evaluate, and, if necessary, propose changes to UCAP thresholds that subject Market Parties to mitigation within each mitigated capacity zone. Exceeding such thresholds create a rebuttable presumption that the Market Party has a financial incentive to withhold UCAP.

This project will consider the following improvements:

1. Revise the supply-side mitigation thresholds for each Mitigated Capacity Zone to more closely align exemptions from the must offer and offer cap with whether a supplier has a financial incentive to withhold UCAP.
 - a. This threshold can be calculated using the demand curve parameters and the amount of UCAP available.
2. Identify a lower bound in which the price impact due to withholding can be considered de minimis.
3. Review whether enhancements are needed to the threshold calculation to account for the effects of nested localities.

The project deliverable for 2025 will be MDCP.

19.3 Project Justification

This project is in response to stakeholder feedback requesting enhancements that would create mitigation thresholds that more closely align with the ability and incentive of the Market Party to influence capacity prices. : _____ (27)

20. Reference Level Software Cleanup

20.1 Problem / Opportunity

The Reference Level Software (RLS) was originally released in 2010. Since that time, many NYISO projects and initiatives have impacted the development of reference levels and the software. Following the release and subsequent enhancements, numerous RLS improvements have been identified. This project intends to implement the list of identified improvements and prepare the RLS for future enhancements.

20.2 Project Objective(s) & Anticipated Deliverable(s)

The first step of this project would be to review the current set of identified RLS improvements, properly document and capture the list in Jira, and determine the priority order of improvements. The ultimate objective for this project would be the development and release of improvements in the RLS in 2025.

20.3 Project Justification

The current state of the RLS could introduce a risk that reference level development and mitigation consultations might not remain compliant with the NYISO's Market Services Tariff in the near future. MMA is required by the Market Services Tariff to develop reference levels using specific methodologies and the most current available data and conduct mitigation consultations in a specific manner. Without improvements, the RLS could increase the risk of both a potential process error or human error when reviewing reports and data that could lead to a tariff violation. The RLS remains a critical piece of software to support the energy markets. Making the identified improvements would position the software well for enhancements that will be needed to support future projects. : _____ (39)

21. Reserving Capacity for TCC Balance-of-Period (BoP) Auctions

21.1 Problem / Opportunity

The NYISO currently conducts Centralized TCC Auctions twice each year. In each of those auctions, longer-duration TCCs (six-month, one-year, and/or two-year) are available for purchase. However, TCCs covering periods shorter than six months are not available in those auctions. Instead, MPs wishing to purchase shorter-term TCCs must do so in the Reconfiguration Auctions, which are held each month. Reconfiguration Auctions may be conducted as either single month auctions or Balance-of-Period (BoP) Auctions. BoP Auctions encompass all remaining months of the applicable Capability Period.

Currently, the NYISO's tariffs require that all transmission capacity not associated with Existing Transmission Agreements or outstanding TCCs and not reserved through conversion of Existing

Transmission Capacity for Native Load (ETCNL) to ETCNL TCCs or Residual Capacity Reservation Rights (RCRR) to RCRR TCCs be made available for sale in the Centralized TCC Auctions. As a result, the opportunity for MPs to acquire shorter-term TCCs in BoP Auctions may be significantly limited. Other ISO/RTOs reserve some transmission capacity for sale in their monthly Financial Transmission Right auctions.

Consequently, this proposal seeks to build upon the 2020 and 2021 project efforts related to the development of software and rule/procedure revisions to permit the NYISO to reserve a portion of available system transfer capability, which it would then release into the BoP Auctions. Such functionality would permit auction participants to purchase additional shorter-term TCCs in the BoP Auctions.

21.2 Project Objective(s) & Anticipated Deliverable(s)

This project is intended to build on the efforts undertaken in 2020 and 2021 to develop market rule changes to accommodate the potential for reserving a portion of otherwise available transmission capacity for release in the BoP Auctions. The project deliverable for 2025 will be Software Design.

21.3 Project Justification

Today the TCC Automated Market System and other supporting systems do not support the reservation of transmission Capacity for sale in BoP Auctions.

The proposed solution is intended to:

1. Address stakeholder requests for such enhancements to the current TCC auction design, as auction participants have consistently indicated interest in reserving transfer capability for release in BoP Auctions; and
2. Provide additional opportunities for interested parties to obtain shorter-duration TCCs because it would remove a constraint that limits the availability of shorter-term TCCs in the BoP Auctions. : _____ (29)

22. Review of Control Area System Resources

22.1 Problem / Opportunity

A Control Area System Resource is a set of Resources owned or controlled by an entity within a Control Area that also is the operator of such Control Area. Entities supplying UCAP using Control Area System Resources do not designate specific Resources, and therefore cannot be evaluated like External Resources and ICAP Suppliers located within the NYCA.

22.2 Objectives & Anticipated Deliverables

The NYISO will evaluate the ability of Control Area System Resources to provide Unforced Capacity to determine whether they are functionally equivalent to other External Resources, and

whether Control Area System Resources are being properly valued for their contribution to resource adequacy. The project deliverable for 2025 is MDCP.

22.3 Project Justification

As part of its efforts to improve modeling for capacity accreditation, the NYISO is in the process of evaluating ICAP Supplier availability and performance. This project will evaluate whether Control Area System Resources are properly accredited and propose changes if necessary. :

_____ (30)

23. Review of Real-Time Market Structure

23.1 Problem / Opportunity

In a time of unprecedented change in the electricity sector, New York's competitive electricity markets must be positioned to unleash the innovation and flexible energy solutions necessary for a reliable transformation towards a zero-emissions power grid. A rapid transition is underway in New York State from a power grid where energy is largely produced by central-station fossil fuel generation, towards a grid with increased intermittent renewable resources and distributed generation.

The pace of this transition is driven primarily by state policy, notably the CLCPA. In addition, technological advancements are expanding the capabilities of new resources and lowering their costs, further driving broader industry changes.

The NYISO is actively working on market enhancements to meet these future challenges. A grid characterized by high levels of intermittent renewable resources, ESR, and DER may require different RTM structures and rules to efficiently balance intermittency and uncertainty while continuing to efficiently schedule energy transactions and commit short lead time resources.

The NYISO approaches this work with two guiding principles: (1) all aspects of grid reliability must be maintained; and (2) competitive markets should continue to maximize economic efficiency and minimize the cost of maintaining reliability while supporting the achievement of New York's climate policy codified in the CLCPA.

23.2 Objective(s) & Anticipated Deliverable(s)

This project will review the existing RTM structure and settlements and determine if changes are needed to maintain reliable operation in real time. The project will review the current RTM and settlement structure, the risks associated with a grid characterized with high levels of intermittent renewable resources, ESR and DER and will review potential alternative structures. The 2025 project deliverable would be Issue Discovery.

23.3 Project Justification

The CLCPA includes the following goals:

- 100% of the state's electricity must be emissions free by 2040
- 9,000MW of offshore wind energy must supply NY by 2035
- 6,000MW of solar energy be installed in NY by 2025
- Statewide reduction of 185 trillion BTUs through energy efficiency
- 6,000MW of energy storage capacity must be installed to serve NY by 2030

This project will help to identify the means to maintain real-time system reliability while addressing the state's goals and mandates in a cost-effective way through the creation of

proper market mechanisms. This project also supports SOM Recommendation 2012-13. :
_____ (38)

24. Storage as Transmission

24.1 Problem / Opportunity

The unique characteristics of energy storage allow these assets to provide many potential services to grid operators. During normal operation, storage can have positive impacts on transmission systems by shifting demand, supporting ancillary services, and managing transmission congestion. Currently, the NYISO tariffs treat storage as a resource that is capable of injecting and withdrawing to shift demand and/or manage transmission congestion and provide ancillary services. In some instances, storage used exclusively as a regulated transmission asset, instead of as a market resource, could provide an alternative option for providing the same services as traditional transmission solutions. Because storage requires scheduling of power to consume or supply, the current market rules do not contemplate evaluating storage as a regulated transmission asset in the planning process. Additionally, the market rules consider storage to be a market-based resource that competes and is scheduled in parallel with other suppliers; the current rules do not contemplate allowing assets that are suppliers such as generators, pumped hydro, or energy storage to be considered with traditional transmission resources to be eligible for cost of service rate recovery.

24.2 Project Objective(s) & Anticipated Deliverable(s)

This project will continue the work recommended in the Issue Discovery and MDCP phases of this effort and may consider two components. The first component would allow a storage project to be considered and evaluated as a regulated solution (including options for cost recovery) in the planning process and assessed in the applicable interconnection process, as necessary. The second component would consider methods for operating the storage as a transmission asset, taking market impacts into consideration. These components are related and may depend on one another.

The 2025 project deliverable will be MDC, where the NYISO will build on the 2024 MDCP to develop a market design and accompanying tariff modifications to be presented for approval by MPs.

24.3 Project Justification

Transmission upgrades may be necessary to deliver more clean energy across New York's electric grid. However, transmission development is often difficult, expensive, and on very extended development time frames. Utilizing storage as regulated transmission assets may provide an alternative for providing or enhancing these services on a shorter timescale and potentially at lower cost, while preserving valuable optionality in the process. However, storage does not create transfer capability on the grid and thus it may not be the appropriate solution in many cases. Without fully vetting the opportunities and risks for considering whether storage can offer viable and reliable alternatives to traditional transmission, the marketplace will not

have certainty on whether there is value to these potential projects, and market rules changes would not be pursued that could unlock these benefits. : _____ (31)

25. Time Differentiated TCCs

25.1 Problem / Opportunity

The project seeks to disaggregate the TCC product from its current 24-hour time span to include additional, more granular products covering shorter timeframes. This enhancement, which is a feature requested by certain MPs, is intended to improve the commercial function and forward congestion price transparency. Currently, the availability of only a 24-hour product may limit the effectiveness in serving as an efficient forward hedging mechanism against congestion for certain MPs' interests because it does not provide forward congestion price signals from TCC auctions that distinguish between the congestion patterns that can occur during different periods of the day or week. MPs could utilize more granular TCC products to tailor portfolios to better hedge congestion costs during different periods of the day or week. This additional flexibility could benefit MPs under current grid conditions, as well as future grid topologies with increased levels of intermittent resources, which have notable variations in output in daytime hours versus nighttime hours. Additionally, defining more granular TCCs may make other market design improvements possible.

25.2 Project Objective(s) & Anticipated Deliverable(s)

The 2025 project deliverable will be MDC, building upon the 2021 project efforts to develop a MDCP and would include working with stakeholders to finalize market rule changes needed to facilitate the creation of TCC products that apply to different periods of time and the market design proposed in 2021.

Due to the potential increased complexity of multi-period granular TCC auctions, the implementation of more granular TCC products may depend on the automation of the Existing Transmission Capacity for Native Load (ETCNL) feasibility analysis process and the automation of an inventory system to calculate the remaining feasible ETCNL and Original Residual TCCs.

25.3 Project Justification

Breaking out the TCC product into time differentiated products may: (1) improve the commercial functionality of TCCs to provide tailored congestion hedges for MPs, including intermittent generation; (2) reduce the cost of congestion hedging for MPs; (3) improve forward congestion price signals from TCC auctions to distinguish between time periods where congestion patterns can vary; and (4) permit other market design improvements. : _____ (33)

26. Valuing Transmission Security

26.1 Problem / Opportunity

The ICAP Market incorporates transmission security limits (TSLs) in its process to establish Locational Capacity Requirements (LCRs). When a TSL binds during the process to establish an LCR, the result indicates that the transmission limitations are driving the need for ICAP in

that Locality rather than strictly resource adequacy needs. A resource can have different contributions to resource adequacy and transmission security. Due to the potential differing reliability values, the ICAP market may not accurately value capacity when requirements are set by transmission limitations rather than strictly resource adequacy needs.

26.2 Project Objective(s) & Anticipated Deliverable(s)

Building off the 2024 Issue Discovery work, this project will propose the necessary ICAP market design changes to provide for efficient capacity market compensation when ICAP Market requirements are set by transmission limitations. The project deliverable for 2025 will be MDC.

26.3 Project Justification

Transmission security margins are declining in southeast New York as noted by the 2023-2032 Comprehensive Reliability Plan. The declining transmission security margins will make it more likely for TSLs to set the LCRs in southeast New York, as was the case all Localities for the 2024/2025 Capability Year. This project supports Recommendation No. 2022-1 from the 2022 SOM Report. : _____ (34)

27. Voltage Support Service for Inverter Based Resources (VSS-IBR)

27.1 Problem / Opportunity

The NYSRC issued **Reliability Rule #151 - Reliability Rule B.5: Establishing New York Control Area (NYCA) Interconnection Standards for Large IBR Generating Facilities** which adopts all normative mandatory requirements specified in IEEE 2800-2022. The new rule necessitates updated testing requirements and settlement mechanisms for inverter-based resources (IBRs). IEEE 2800-2022 requires that new large IBR generating facilities have the capability to produce and absorb MVARs at zero active power output. However, the mandates of the new rule may not be required by the NYISO under its existing Voltage Support Service program. This requires the NYISO to revisit the existing payment structure and revise existing protocols to accurately assess IBR performance and facilitate appropriate compensation for reactive support provision.

27.2 Project Objective(s) & Anticipated Deliverable(s)

The Voltage Support Service for Inverter Based Resources (VSS-IBR) project will deliver updated testing requirements and settlement mechanisms to align with the new rule set forth by the NYSRC. The 2025 project deliverable would be MDCP.

27.3 Project Justification

This project is crucial for compliance with the latest NYSRC reliability rules regarding reactive power capability for IBRs. This project will explore providing an incentive to existing IBRs to upgrade their equipment to provide reactive power support at zero MW output. Procuring this service greatly enhances grid reliability and will alleviate the need to Supplemental Resource Evaluation (SRE) fossil fuel-based generators for voltage support only. Being able to rely on this

service might even contribute to efficient/economic solutions to the voltage issues identified during reliability planning process. By aligning testing requirements and settlement mechanisms with the new rule, the project facilitates accurate assessment of IBR performance and fair compensation for reactive support provision. This enhances grid stability and reliability while promoting the efficient utilization of IBRs in the NYCA. Through optimized operations and adherence to regulatory standards, the project contributes to the sustainability and resilience of the state's energy infrastructure. : _____ (35)

28. Winter Reliability Capacity Enhancements

28.1 Problem / Opportunity

The NYISO's planning analyses indicate that the New York State electric system is evolving from a summer peaking/summer risk system to a winter peaking/winter risk system. Ahead of this change, the NYISO's ICAP Market structure will need to be reviewed to assess whether price signals, obligations, and incentives provided by the ICAP Market will continue to be effective in a winter peaking system.

28.2 Project Objective(s) & Anticipated Deliverable(s)

The Winter Reliability Capacity Enhancements project will address issues identified in the 2024 Winter Reliability Capacity Enhancements report. In 2025, NYISO will explore specific market enhancements and propose design changes to support a winter peaking/winter risk system. The project deliverable for 2025 will be MDC.

28.3 Project Justification

The existing structure of the ICAP Market is based on New York being a summer peaking electric system. As New York moves from a summer peaking system to a winter peaking system, changes to the Installed Capacity Market may be needed to ensure the market continues to efficiently provide for New York's resource adequacy needs. This project also supports SOM Recommendation 2022-2. : _____ (36)

29. Winter Fuel Constraint Study

29.1 Problem / Opportunity

The NYISO's Resource Adequacy studies model constraints on natural gas and secondary fuel during the winter season. Natural gas and secondary fuel constraints are correlated with various weather conditions, including extreme conditions. The current natural gas and secondary fuel constraint modeling assumptions are based on available data that only covers normal weather

conditions and does not contain sufficient detail to analyze conditions that are beyond normal conditions that contribute to the fuel constraints.

29.2 Project Objective(s) & Anticipated Deliverable(s)

The NYISO will perform the fuel constraint study for the entire NYCA system. The study is expected to answer the following questions:

- What is the amount of natural gas available to electricity generators during winter under various weather conditions, considering gas pipeline limitations, Local Distribution Company limitations, economic limitations due to natural gas price, as well as impact from Liquefied Natural Gas?
- What is the dependable storage level of secondary fuel of electricity generators during winter under various weather conditions, considering on-site storage size, replenishment of on-site storage, and lead time for on-site fuel switching if needed?
- How are these fuel constraints expected to change in the next 10 years?

The 2025 milestone will be Study Complete.

29.3 Project Justification

The winter fuel constraint study will help refine the assumptions made in the Resource Adequacy study, leading to more accurate representation of the Resource Adequacy risk during the winter season. The refined assumptions will benefit both the annual Installed Reserve Margin study and the bi-annual Reliability Needs Assessment study. : _____ (37)

Total : _____

VERB Please enter any additional comments below:

VERB2 Please provide any recommendations you may have for future enhancements to the Project Prioritization Process:

SUBMIT After clicking submit, you will be able to see a summary of your responses. After reviewing, if you wish to make any changes, you can click the left arrow and return to this page to make any changes.

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SUBMIT2 Your project priorities will not be submitted until you click submit on this page. If you want to continue working, DO NOT CLICK SUBMIT UNTIL YOU ARE COMPLETELY DONE - you can click the left arrow below to edit your responses.

After clicking submit, a summary of your scores will be available in PDF form.

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